

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of,

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

: PROMESA
: Title III
:
:
: No. 17 BK 3283-LTS
: (Jointly Administered)

Debtors.¹

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**URGENT UNOPPOSED MOTION SEEKING ENTRY OF MODIFIED ORDER
EXTENDING TIME TO FILE SUPPLEMENTAL VERIFIED STATEMENT
PURSUANT TO PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

To the Honorable United States District Court Judge Laura Taylor Swain:

Deloitte Consulting LLP (“Deloitte Consulting”) and Deloitte Financial Advisory Services LLP (together with Deloitte Consulting, the “Deloitte US Entities”) respectfully submit this motion (the “Motion”) for entry of a modified order, substantially in the form attached hereto as Exhibit A, extending to **October 14, 2022** any applicable time for the Deloitte US Entities to file a supplemental verified statement(s) pursuant to the to *Order on Motion of the United States Trustee*

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

for Amendment of the Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals [Docket No. 21334] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”). In support of this Motion, the Deloitte US Entities respectfully represent as follows:

RELIEF REQUESTED

1. On September 14, 2022, the Deloitte US Entities filed their *Urgent Unopposed Motion Seeking Extension of Time to File Supplemental Verified Statement of Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (the “Extension Motion”) [Docket No. 22195]. By the extension motion, the Deloitte US Entities sought an extension, to October 14, 2022, of the time for them to file any supplemental declaration under PRRADA (“Supplemental Disclosure”).

2. By Order entered September 15, 2022 (the “Entered Extension Order”) [Docket No. 22219], the Court granted the Extension Motion.

3. Prior to Deloitte’s submission of the Extension Motion, the United States Trustee and the Deloitte US Entities agreed in connection with Deloitte’s request for an extension, the United States Trustee would have thirty days from the date of the filing of any Supplemental Disclosure by the Deloitte US Entities to review such disclosure and submit formal or informal comments or objections, if any. The Entered Extension Order did not contain language to this effect, so the Deloitte US Entities seek entry of a modified order memorializing this agreement, which would supersede the Entered Extension Order. The additional language is contained in new paragraph 5. The proposed order is otherwise unchanged from the Entered Extension Order.

4. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE the Deloitte US Entities respectfully request the Court to enter the proposed modified order attached hereto as **Exhibit A**, granting the relief requested herein and all other relief that is just and proper.

Dated: September 19, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/Alexandra C. Casellas
Alexandra Casellas-Cabrera
USDC-PR No. 301010
ADSUAR MUÑIZ GOYCO SEDA & PÉREZ-OCHOA, P.S.C.
P.O. Box 70294
San Juan, PR 00936-8294
Tel: 787-756-9000
Fax: 787-756-9010
Email: acasellas@amgprlaw.com

LOEB & LOEB LLP

Daniel B. Besikof
345 Park Avenue
New York, New York 10154
Tel: (212) 407-4000
Fax: (212) 407-4990
Email: dbesikof@loeb.com

Attorneys for Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of,

THE COMMONWEALTH OF PUERTO
RICO, *et al.*

Debtors.²

: PROMESA
: Title III
:
:
:
: No. 17 BK 3283-LTS
: (Jointly Administered)

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**MODIFIED ORDER EXTENDING TIME TO FILE
SUPPLEMENTAL VERIFIED STATEMENT PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

Upon the *Urgent Unopposed Motion Seeking Extension of Time to File a Supplemental Verified Statement of Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (the “Motion”);³ and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper

² The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

³ Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is

HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The time for Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP to file a supplemental verified statement(s) pursuant to *Order on Motion of the United States Trustee for Amendment of the Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals* [Docket No. 21334] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 shall be extended **to October 14, 2022**, without prejudice to the right of Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP to request further extensions of time.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
4. This Modified Order supersedes the Court's prior order concerning the Extension Request at docket entry no. _____.
5. The United States Trustee shall have thirty days from the date of filing of any supplemental disclosure described in paragraph 2 above to review such supplemental disclosures and to submit formal or informal objections, if any.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
Chief United States District Judge